IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYER'S

CONCUSSION LITIGATION

THIS DOCUMENT RELATES TO:

Plaintiffs Master Administrative Long Form Complaint and:

Plaintiff: MARTY CARTER

Case No.: 2:12-md-02323-AB

Hon. Anita B. Brody

NOTICE OF ATTORNEY'S LIEN

Attorney John W. Lorentz, and The Lorentz Law Firm, P.A., attorney(s) for Plaintiff, MARTY CARTER in the above-entitled action, hereby notify this Court and all parties that they have a lien in this case for reasonable contingent attorney's fees plus reimbursement for legitimate case costs and expenses as set forth in the accompanying Petition to Establish Attorney's Lien relating to Plaintiff, Marty Carter.

Dated: March 20, 2023 /S/ John W. Lorentz

John W. Lorentz, Esq. (#0276763)

The Lorentz Law Firm, PA

398 Snow Drive

Fort Myers, FL 33919

O: (651) 483-4400

C: (651) 329-7321

F: (651) 204-0065

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing *Notice of Attorney's Lien* to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania on all parties registered for CM/ECF in the litigation.

Dated: March 20, 2023 /S/ John W. Lorentz

John W. Lorentz, Esq. (#0276763) The Lorentz Law Firm, PA 398 Snow Drive Fort Myers, FL 33919

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PETITION TO ESTABLISH ATTORNEY'S LIEN

COMES now the Petitioner, John W. Lorentz, Esquire, for The Lorentz Law Firm, P.A., ("Lorentz") pursuant to a fully executed and binding retainer agreement state:

1. On or about December 1, 2016, Petitioner was retained and employed by the Plaintiff, Marty Carter, pursuant to a contingent fee agreement, to pursue a claim for injuries and damages caused by the National Football League's and all other responsible parties' liability for former and/or retired NFL players' long- term brain injuries and other head injuries and damages associated with football-related concussions, head and brain injuries i.e., The *In re: National Football League Players' Concussion Injury Litigation* class action settlement.

- 2. The specifics of the agreement for legal services are as follows: If no recovery (by settlement or trial) is obtained, client will not owe a legal fee. If The Lorentz Law Firm P.A., obtains a settlement or judgment for Client, Client will pay to the Petitioner fifteen percent (15%) plus any common benefit fund assessment from the gross award and the reimbursement of expenses.
- 3. When Petitioners entered the contract with Plaintiff, Petitioners entered into the risk and expense of the litigation.
- 4. From the date the Petitioners were authorized to proceed on behalf of the Plaintiff, the Petitioners have actively and diligently investigated, prepared, and pursued Plaintiff's claims, and has taken all steps necessary to prosecute those claims, including, but not limited to, correspondence and communications with the client, preparation and review of client's factual and legal circumstances, providing client updates, analyzing Plaintiff's medical status and need for medical testing, etc.
- 5. Petitioners were not terminated due to any good cause, malfeasance, or other improper action.
- 6. The Petitioners claims the right to have a lien for attorney's fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

WHEREFORE, the Petitioners prays:

1. That an attorney's lien be established;

2. That the amount of the lien be determined;

3. That the Court order that Petitioner be entitled to enforce an

attorney's lien against the proceeds to be derived from any settlement or

judgment in this action;

4. That the Defendant or the Defendant's insurer be prohibited from

paying to the Plaintiff any sums of money until said lien has been satisfied;

and;

5. For such other further relief as this Court deems just.

Dated: March 20, 2023

/S/ John W. Lorentz

John W. Lorentz, Esq. (#0276763)

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District Court for the Eastern District of Pennsylvania on all parties registered for CM/ECF in the litigation.

Dated: March 20, 2023 /S/ John W. Lorentz

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